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LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON DRAFT SITE  
CHARACTERIZATION FOR RECREATIONAL VEHICLE FAMILY CAMPING AND FUEL  
PIPELINE AREAS NAS FORT WORTH TX

2/9/1998

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION



**NAVAL AIR STATION  
FORT WORTH JRB  
CARSWELL FIELD  
TEXAS**

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**ADMINISTRATIVE RECORD  
COVER SHEET**

AR File Number 682

Barry R. McBee, *Chairman*  
R. B. "Ralph" Marquez, *Commissioner*  
John M. Baker, *Commissioner*  
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File: 17A-71  
D.E. 682  
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## TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

*Protecting Texas by Reducing and Preventing Pollution*

February 9, 1998

Mr. Charles A. Rice  
Team Chief  
Base Closure Restoration Division  
HQ AFCEE/ERB  
3207 North Road  
Brooks AFB, Texas 78235-5363

Re. TNRCC Comments - Draft Site Characterization Report for the Recreational Vehicle Family Camping and Fuel Pipeline Areas, NAS Fort Worth JRB- Carswell Field, Fort Worth (Tarrant County), Texas  
(Facility ID No. 009696)

Dear Mr. Rice

We have performed a technical review of the Draft Site Characterization (SC) Report for the Vehicle Family Camping and Fuel Pipeline Areas (March 1997) for NAS Fort Worth JRB (formerly Carswell AFB). The following comments, on the Fuel Pipeline Areas, are presented alphabetically and by the chapters, sections, and pages corresponding to the Draft SC Report. It is our understanding that the U.S. Environmental Protection Agency (EPA) have provided comments on the remaining portions of this report.

### I. GENERAL COMMENT

- Efforts should be made to identify any Leaking Petroleum Storage Tank (LPST) sites that are referenced in the report (BSG, BSS, etc.) which provide evidence to the final findings of the investigation.

### II. SPECIFIC COMMENTS

#### A. Executive Summary - Page xiii.

*USAF states that no further action status is recommended because no significant impact to human health and the environment exist.*

USAF should also state that no potential for significant impact exists under future exposure scenarios for the sub-population chosen in Section 5.0 (Risk Evaluation).

#### B. Section 1.2.4 - Regional Geology and Hydrogeology, Page 1-3.

USAF should include a geologic stratigraphic map that represents the subsurface along the pipeline areas. Information from field investigations in combination with regional geologic knowledge should be utilized to prepare such a map.

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Depth and thicknesses of the hydrogeologic units of concern should be specified in the report.

C. Section 1.4.1.3.- Comprehensive Site Assessment of the BSS, Page 1-9.

USAF should make efforts to include the most up-to-date information obtained through the latest field investigations at the BSS. Also, SC report should mention that the sources at this location have been removed/eliminated.

D. Section 2.4.3 - Methodology for Risk Evaluation, Page 2-17:

Please identify the referenced TNRCC PST Division documents utilized for risk evaluation/methodology as RG-175 and RG-36 respectively.

E. Section 2.4.3.2 - Screening Action Levels (SALs) PSTD Areas, Page 2-19:

Different methodologies were used to set SALs for organics and inorganics due to some chemicals not being in Table A-1 of Beneficial Groundwater Use Category I levels. For SALs set to background levels, additional justification should be provided for the selection of background concentrations as maximum concentrations obtained during 1994 field investigations of other areas. Characterization of background conditions should be determined by placement of borings outside the area of potential contamination. Because direct sampling data from the area of concern prior to waste management activities is seldom available, the use of nearby, non-impacted sampling data in conjunction with statistical/geostatistical estimation techniques and/or statistical models is recommended.

F. Section 2.4.3.2 - Action Levels, Page 2-19:

USAF should provide the basis (ex: TDS, receptors, groundwater depth, etc..) for selecting the more stringent Beneficial Groundwater Use Category I target levels over Category II, which is the denomination currently applied to other PSTD areas at the Base. Information about the probable well yield, based on nearby and/or regional experience, at the depths of concern is critical to a risk-based approach.

G. Section 5.0 - Risk Evaluation:

An attempt should be made to identify all complete exposure pathways. The ingestion of COPCs in subsurface soil pathway for the industrial worker population appears to be incomplete due to unlikely excavation activities. TNRCC PSTD recommends the inclusion of the future construction worker scenario because the possibility for repairs/maintenance of the active Pride Petroleum pipeline appears to be likely. Also, target risk for the future pipeline construction/repair/maintenance worker scenario would be protective of the industrial worker.

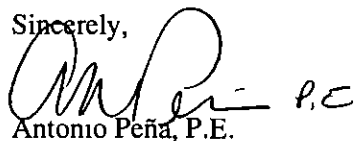
USAF should specify the target risk in the SC report. For PSTD areas, the permissible risk for future exposure scenario is  $1 \times 10^{-4}$ .

We appreciate your asking for our comments of this draft regulatory document. Should you have any

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questions concerning our comments, please contact me at 512/239-2200.

Sincerely,

A handwritten signature in black ink, appearing to read 'Antonio Peña, P.E.', with a stylized flourish at the end.

Antonio Peña, P.E.  
Federal Facilities Coordinator  
Responsible Party Remediation Section  
Petroleum Storage Tank Division

ARP/keh  
scpipeli.dft

cc: Sam Barrett, TNRCC Region 4 Field Office  
(1101 East Arkansas Lane, Arlington, Texas 76010-6499)  
Mr Olen Long (AFBCA/OL-H)  
(6550 White Settlement Road, Ft Worth, TX 76114-3520)

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